

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

U.S. ETHERNET INNOVATIONS, LLC,

PLAINTIFF,

v.

**STMICROELECTRONICS N.V. and
STMICROELECTRONICS, INC.**

DEFENDANTS.

CIV. A. NO. 6:12-CV-481-LED

**DECLARATION OF KEVIN FILLIP IN SUPPORT OF
STMICROELECTRONICS, INC.'S MOTION TO TRANSFER**

I, Kevin Fillip, hereby declare, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney admitted to the Bar of the State of Texas. I am Deputy General Counsel of Defendant STMicroelectronics, Inc. ("ST"). I am over eighteen (18) years of age, and I am otherwise fully competent to make this Declaration. I am aware of the facts of this case, and I make this declaration upon personal knowledge and following a reasonable investigation.

2. ST does not design or manufacture any of the accused products that Plaintiff U.S. Ethernet Innovations, LLC ("USEI") identified in its Infringement Contentions. Instead, to the extent they exist, ST purchases the accused products from various related foreign entities, and sells certain of the accused products in the United States, including the Northern District of California.

3. ST maintains multiple facilities in California, and it maintains significant business operations in the Northern District of California. ST employs approximately 190 people in the

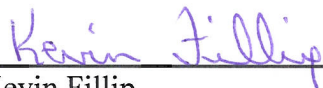
Northern District of California at its facility in Santa Clara, California. Additionally, ST employees in Santa Clara, California are responsible for sales and marketing activities in the United States for certain accused products that USEI identified.

4. Based on USEI's allegations in its Original Complaint and Infringement Contentions, ST does not have any relevant files, records, documentation, technical material, information, or foreseeable witnesses that are located or maintained in the Eastern District of Texas. ST has no offices in the Eastern District of Texas, and has no employees in the Eastern District of Texas.

5. ST's distributors of the accused ST products, who are unrelated third parties, maintain offices in the Northern District of California, and on information and belief, documents and information relating to their sales and marketing activities of various accused ST products are located in the Northern District of California.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 16, 2012.



Kevin Fillip